

November 19, 2012

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: *Developing a Unified Intercarrier Compensation Regime, et al.*,  
CC Docket Nos. 01-92 and 96-45, WC Docket Nos. 03-109, 05-  
337, 07-135 and 10-90, WT Docket No. 10-208, and GN Docket  
No. 09-51 – Notice of Ex Parte Communication

Dear Ms. Dortch:

On Thursday, November 15, 2012, Leonard Steinberg and Richard Cameron of Alaska Communications Systems Group, Inc. (“ACS”) and I met with the FCC personnel listed below concerning the Commission’s Phase I Connect America Fund (“CAF”) program.

ACS described how it has been devoting substantial resources to ensuring that its operating local exchange carrier (“LEC”) subsidiaries are in compliance with the Commission’s recent *CAF-ICC Transformation Order* and the rules adopted thereunder and in subsequent orders in these proceedings. In particular, ACS discussed a number of questions that have arisen concerning the permitted use of universal service support as restructured under CAF, and how eligible telecommunications carriers such as the ACS LECs receiving frozen Phase I CAF support in 2013 will be able to demonstrate compliance with the requirement to devote a substantial portion of that support to building and operating broadband-capable networks. The enclosed materials were distributed in the meeting, and capture the substance of the discussion.

Marlene H. Dortch  
November 19, 2012

Please direct any questions regarding this matter to me.

Very truly yours,

/s/

Karen Brinkmann

*Counsel to Alaska Communications Systems  
Group, Inc.*

Enclosure: PowerPoint presentation

cc: Michael Steffen  
Carol Matthey  
Rebekah Goodheart  
Trent Harkrader  
Amy Bender  
Alex Minard  
Ryan Yates  
Erin Boone